

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CLEAN ENERGY CHOICE COALITION, NFP

Plaintiff,

v.

VILLAGE OF OAK PARK, ILLINOIS,

Defendant.

Case No. 1:25-cv-04353  
Hon. Franklin U. Valderrama

**DECLARATION OF DYLAN HRADEK IN SUPPORT OF PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT**

I, Dylan Hradek, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that I have personal knowledge of the following facts, which are true and correct:

1. I am over eighteen years of age and make this declaration based on information personally known to me.

2. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently to them.

3. I submit this Declaration in support of Plaintiff Clean Energy Choice Coalition, NFP's Motion for Summary Judgment.

4. I am President at NPL Construction Co. ("NPL"), and have served in that role since

5. NPL is a member of Clean Energy Choice Coalition, NFP.

6. NPL provides natural gas and energy infrastructure construction solutions, such as installing and restoring natural gas mains, and that business has long included Oak Park.

7. By prohibiting natural gas in new construction, the Ordinance has curtailed demand for NPL's services in Oak Park, directly reducing NPL's revenue.

8. As existing buildings in Oak Park are gradually replaced with new buildings that

(due to the Ordinance) cannot use natural gas, NPL's customer base and revenues will be continuously and permanently reduced.

9. NPL has suffered and will continue to suffer serious harms, including lost customers, sales, and revenue; loss of employment; and increased expenses. Such expenses cannot be recouped, which makes NPL's financial suffering an irreparable harm.

10. Money damages will not adequately remedy the harm already caused by the Ordinance to NPL, and the harm that the Ordinance will continue to cause.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on this 25th day of August, 2025 in Naperville, Illinois.

Dylan Hradek